

**EXHIBIT 92**  
**REDACTED**

Page 1

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF TEXAS  
3                   SHERMAN DIVISION  
4  
5                   THE STATE OF TEXAS, et         )  
6                   al.,                                  )  
7    ) Case No.  
8                   Plaintiffs,                         ) 4 :20 - cv - 00957 - SDJ  
9  
10                  vs.                                  ) Hon. Sean D. Jordan  
11    )  
12                  GOOGLE LLC,                         )  
13    )  
14                  Defendant.                         )

TUESDAY, APRIL 30, 2024

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

25 Job No. MDLG6673373

Page 2

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11 VINCE ROSICA, trial technician,  
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1                   VIDEOGRAPHER: Good morning.

2                   We are now on the record. My name is  
3                   Bill Geigert. I'm the videographer  
4                   for Golkow Litigation Services.

5                   Today's date is April 30, 2024,  
6                   and the time is 9 a.m.

7                   This remote video deposition is  
8                   being held in the matter of the State  
9                   of Texas, et al., versus Google LLC.

10                  The deponent is [REDACTED].

11                  All parties to this deposition  
12                  are appearing remotely and have agreed  
13                  to the witness being sworn in  
14                  remotely.

15                  Due to the nature of remote  
16                  reporting, please pause briefly before  
17                  speaking to ensure all parties are  
18                  heard completely.

19                  All counsel will be noted on  
20                  the stenographic record.

21                  The court reporter is Carrie  
22                  Campbell, and she will now swear in  
23                  the witness.

24                  /

25                  /

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1

[REDACTED]  
2 of lawful age, having been first duly sworn  
3 to tell the truth, the whole truth and  
4 nothing but the truth, deposes and says on  
5 behalf of the Plaintiffs, as follows:

6

7 DIRECT EXAMINATION

8 QUESTIONS BY MR. CHANG:

9 Q. Good morning, [REDACTED]

10 A. Good morning.

11 Q. Will you please state your name

12 for the record?

13 A. [REDACTED]

14 Q. [REDACTED] do you understand

15 that you're under oath today?

16 A. Yes, I do.

17 Q. And you just swore to tell the

18 truth under penalty of perjury.

19 Right?

20 A. Yes, I did.

21 Q. Have you ever been deposed

22 before?

23 A. Yes, I have.

24 Q. How many cases?

25 A. I've been deposed two times for

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1                   So when an advertiser tells us  
2 they want to spend advertising dollars with  
3 us to achieve a certain outcome, we have to  
4 understand as an ad technology provider  
5 whether or not we're driving those outcomes.

6                   Now, in a non-digital world, I  
7 may just have to have the advertiser call me  
8 on the telephone and say, your ads are  
9 driving results for me. Thank you.

10                  In ad technology, you can use a  
11 piece of technology that an advertiser  
12 chooses to embed on their website to send a  
13 signal to the ad technology providers they  
14 work with to tell them that actions are being  
15 taken as a result of exposure to an ad.

16                  Q.        So an example of that might be  
17 click-through rate?

18                  A.        So click-through rate is a  
19 metric in the advertising industry but isn't  
20 specifically a conversion, per se.

21                  Now, I would say that a  
22 click-through rate could be a measure by  
23 which something could lead to a conversion.

24                  And so in consumer language,  
25 let's say you visited -- I'm sorry, let's say

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1 you see an ad online. You click on the ad.  
2 And then you see the ad nine more times and  
3 you don't click on the ad. That means the ad  
4 has a 10 percent click-through rate. Or one  
5 out of ten times an ad was shown, it was  
6 clicked on.

7 That's the definition of a  
8 click-through rate.

9 Q. Have you personally ever  
10 disclosed Project Bernanke to a customer?

11 A. I don't believe I've ever used  
12 the phrase "Project Bernanke" in a  
13 customer-facing meeting.

14 Q. Have you ever disclosed the  
15 substance of Project Bernanke to any  
16 customer?

17 A. It is likely I have spoken to  
18 customers about how Google's bid strategies  
19 help drive outcomes, of which experiments  
20 like Bernanke could have played a role.

21 Q. Have you ever explained the  
22 mechanics through which Bernanke accomplishes  
23 the goals that you just mentioned to a  
24 customer?

25 A. It's likely that I have. I

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1 can't think of a specific customer example  
2 sitting here today.

3 Q. Why do you say it's likely?

4 A. Because we talk about how  
5 Google's advertising products work when we  
6 meet with customers, especially when they're  
7 asking about them.

8 Q. Explain the mechanics of  
9 Bernanke to me.

10 A. So my understanding of Bernanke  
11 is primarily in the context of how our bid  
12 strategies work overall, which is focusing on  
13 an advertiser outcome.

14 And in order to focus on an  
15 advertiser outcome, we need to have a good  
16 understanding of what it will take to win an  
17 advertising auction that we feel would lead  
18 to, or has a chance to lead to, the outcome  
19 the advertiser is after, right, whether  
20 that's buying a pair of shoes, et cetera.

21 And so my understanding of  
22 Project Bernanke is, it was a way to  
23 understand what was the bid required to win  
24 an impression based on competing in a lot of  
25 these auctions, and then adjust the bid

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1 CERTIFICATE

2 I, CARRIE A. CAMPBELL, Registered  
3 Diplomate Reporter, Certified Realtime  
4 Reporter and Certified Shorthand Reporter, do  
hereby certify that prior to the commencement  
of the examination, [REDACTED] was duly  
sworn by me to testify to the truth, the  
whole truth and nothing but the truth.

5 I DO FURTHER CERTIFY that the  
6 foregoing is a verbatim transcript of the  
7 testimony as taken stenographically by and  
before me at the time, place and on the date  
hereinbefore set forth, to the best of my  
ability.

8  
9 I DO FURTHER CERTIFY that I am  
10 neither a relative nor employee nor attorney  
11 nor counsel of any of the parties to this  
action, and that I am neither a relative nor  
employee of such attorney or counsel, and  
12 that I am not financially interested in the  
action.

13  
14 *Carrie A. Campbell*  
15

16 CARRIE A. CAMPBELL,  
17 NCRA Registered Diplomate Reporter  
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California Certified Shorthand  
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Notary Public  
Dated: May 1, 2024